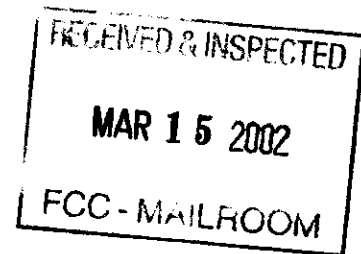




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EX PARTE OR LATE FILED



October 18, 2001

NATIONAL  
OCEAN  
INDUSTRIES  
ASSOCIATION  
Ms. Magalie Salas, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

1120 G STREET  
NORTHWEST  
SUITE 900  
WASHINGTON DC  
20005  
**Re: *Ex Parte* presentation ET Docket No. 98-153/ Revision of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission Systems**

Dear Ms. Salas:

Pursuant to Section 1.1206(a)(2) of the Commission's Rules, on behalf of National Ocean Industries Association, I am filing this letter to report an oral *ex parte* communication in the above referenced proceeding.

202 347 6900 TEL  
202 347 8650 FAX  
WWW.NOIA.ORG  
Yesterday, Raul Rodriguez of Leventhal, Senter & Lerman P.L.L.C., and Amy Mehlman of Capitol Coalitions, Inc. and Jeannie Mills and I of NOIA met with Commissioner Kevin Martin to discuss the potential significant impact the proposed changes to the Commission Rules regarding ultra-wideband technologies would have on the domestic offshore oil and gas industry and domestic energy production. A copy of our presentation to Mr. Martin is enclosed.

If there are any questions about this submission, please call me at the number below.

Sincerely yours,  
Mr. Bob Moran

Director of Government Affairs  
National Ocean Industries Association

cc: Commissioner Kevin martin

No. of Copies rec'd 0+1  
List A B C D E

## **Domestic Offshore Energy Industry's Position on Ultra Wide Bandwidth**

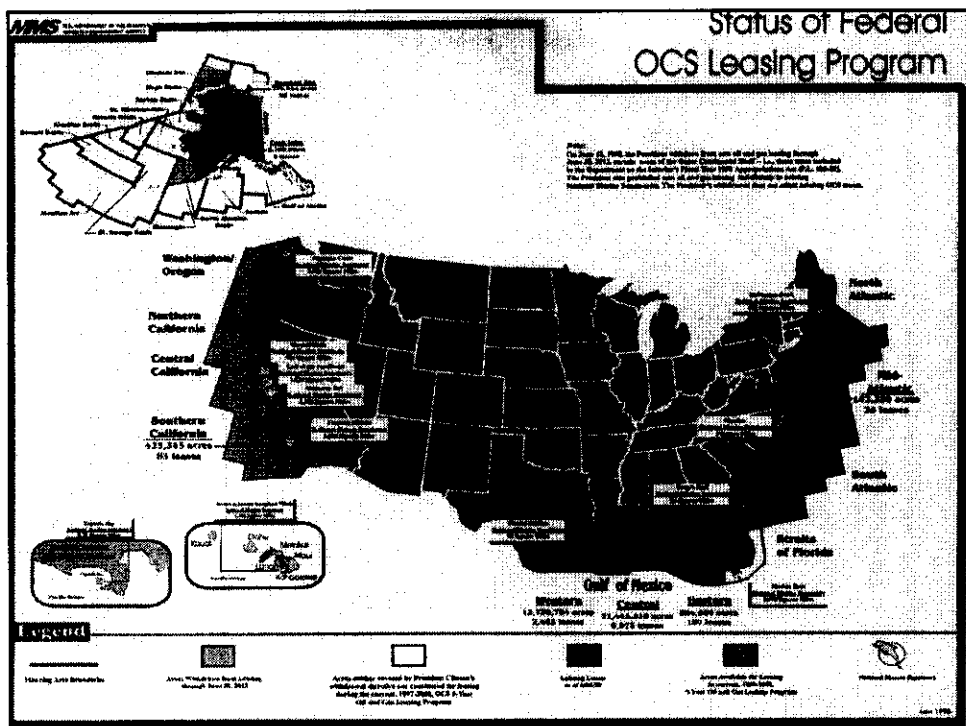
October 1, 2001

**National Ocean Industries Association**

## **National Ocean Industries Association**

- **Member Companies**
- **All members of the Offshore Continental Shelf Oil and Gas Exploration and Production Industry**
  - **Significant Contributor to Domestic Energy Production**
  - **One of Federal Government's Largest Sources of Non-Tax Income**
  - **Operations Demand Critical Emergency Communications, Precise Positioning, Data and Voice Communication Services**

**NOIA**



## U.S. Onshore and Natural Gas Industry Facts

- Significant Contributor to U.S. Domestic Energy Production
- Second Largest Source of Federal Revenue
- Global Leader in Advanced Ocean Technologies

**NOIA**

## UWB Impacts on Critical Offshore Energy Communications Requirements

Offshore Safety is Paramount

Offshore Positioning Services (GPS)

Offshore Communication (on and sea)

– Offshore Construction

– Subsea Operations

### ■ Data Streaming

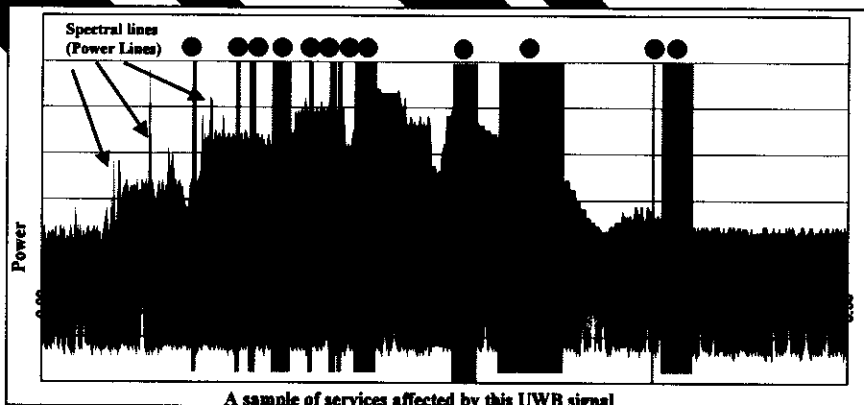
– Geophysical Data Streaming

– Remote Operations (ROV/RODA)

### ■ Wireless Communications

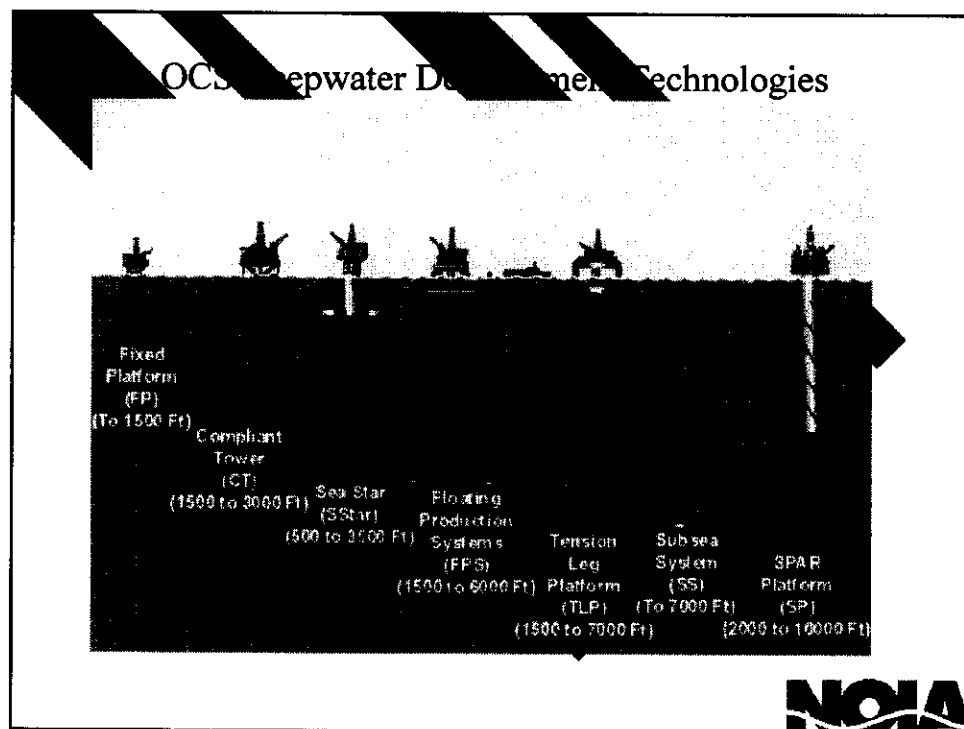


## Frequency Spectrum of a Sample UWB Signal (Centered at 25 GHz)



Source: M. Luo et al, *Potential Interference to GPS from UWB Transmitters; Test Results*, ET Docket No. 98-153  
(October 26, 2000) (Stanford University test sponsored by DOT)






## Discoverer Enterprise

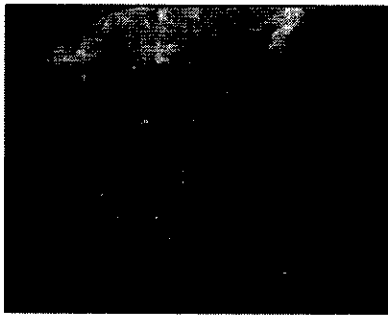
Discoverer Enterprise is the only ultra-deepwater rig in the world, capable of drilling, testing and producing wells in water depths to 10,000 feet.

- 335 ft long
- Constructed from 15,000 tons of steel
- Capable of generating 10 megawatts of power (enough to power 40,000 homes)
- About 1,600 miles of cable and wiring run through Discoverer Enterprise (approx. distance from Houston to New York)
- Living Quarters can accommodate up to 200 people



**NOIA**

## USFS Tension Leg Platform



- The USFS Tension Leg Platform (TLP) is a tension leg platform (TLP) located 800 feet of water at the USFS Tension Leg Platform Block 809, approximately 130 miles southeast of New Orleans.

Leases acquired in 1968 and 1968  
Total project cost (excluding lease costs)  
Approx. \$1.45 billion

- The TLP was completed in July 1996 and completed in June 1998

Total steel weight - 63,300 tons  
Designed to simultaneously withstand  
the force waves and winds.  
Designed to process 150,000  
barrels of oil and condensate/ day, plus  
million cubic feet of gas/day

**NOIA**

## Bush Administration Executive Order 13211

Executive Order 13211 - requires  
“to minimize the adverse effects of  
regulatory action on energy  
supply” in the event adverse material  
affects production,  
competition, job, or prices in the  
energy sector.

## **NOIA Opposes Delay of UWB on Existing Licenses**

- UWB interference with GPS industry's safety critical communications is unacceptable
- UWB interference with integrity of GPS system would have material adverse effect on domestic GPS production

**NOIA**

## **NOIA Mission Statement**

**NOIA's mission is to secure reasonable access to environmentally valuable offshore hydrocarbon resources in order that they may be developed, produced and supplied in an environmentally responsible manner.**

**NOIA**